

August 25, 2017

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VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *Misuse of Internet Protocol (IP) Captioned Telephone Service Telecommunications Relay Services*, CG Docket No. 13-24.

Dear Ms. Dortch:

On August 23, 2017, Michael Holm, Vice President of Engineering & IT, and Bruce Peterson (via phone), Vice President of Marketing, CaptionCall, LLC (“CaptionCall”); Scott Wood (via phone), General Counsel, Sorenson Communications, LLC (“Sorenson”); John Nakahata of Harris, Wiltshire & Grannis LLP, outside counsel to Sorenson and its subsidiary CaptionCall; and the undersigned, outside counsel to Sorenson and CaptionCall, met with Karen Peltz Strauss, Eliot Greenwald, Robert Aldrich, Michael Scott and Susan Bahr of the Consumer & Governmental Affairs Bureau; Andrew Multz and David Schmidt of the Office of Managing Director and Henning Schulzrinne of the Office of Strategic Planning and Policy Analysis to discuss the status of automatic speech recognition (“ASR”) and ways to give providers incentives to invest to improve ASR technology so it can deliver functionally equivalent communications and reduce the use of communications assistants (“CAs”) in the future.

In the meeting, CaptionCall highlighted its efforts to evaluate the status of all major ASR models, looking for improvements in accuracy, speed, comprehension and cost. CaptionCall is fully committed to developing an ASR solution that is capable of captioning IP CTS calls in a manner that is usable and comprehensible to hard of hearing consumers. CaptionCall explained that, for the past two years, it has been using third-party experts and examining various technology implementations to help understand and test the latest ASR developments toward use with untrained, free-flowing conversations on voice calls.

While testing conducted and planned to date by MITRE are good initial steps, testing to simulate real-world situations such as variations in call length, content, accents, and connection

quality, rather than a highly controlled lab setting, will produce a more accurate picture of the current capabilities and limitations of ASR. In order to ensure that consumers can continue to receive functionally equivalent service, it is important to understand the factors that make captions usable and comprehensible—factors that likely extend beyond word error rate and latency to also include punctuation, disfluencies, accents, and presentation. CaptionCall understands that MITRE cannot test everything at once, but raises these issues so that planning of future evaluations of both human-assisted IP CTS and full ASR IP CTS can take these into account.

While advancements in ASR have been made, CaptionCall explained that the technology is not yet capable of delivering functionally equivalent service or scaling to handle the volume and duration of IP CTS calls. CaptionCall encouraged the Federal Communications Commission (“Commission”) to consider ways to encourage IP CTS providers to make the necessary investments to improve ASR so it is capable of enabling users to have functionally equivalent conversations.

CaptionCall believes that the Commission has an opportunity to facilitate advancements in ASR that could minimize the need for CAs for many calls in the future. CaptionCall wants to expedite the use of advancements in ASR to the extent that the technology is capable of enabling functionally equivalent service for IP CTS calls. To do so, the Commission must create proper incentives for providers to make the necessary investments to achieve such goals. For example, the Commission should provide certainty over the next four years both in terms of the rate itself as well as making clear that ASR-related investment, research, and development costs, including changes to technology, operational systems, user interfaces, and intellectual property, are considered fully compensable. If the Commission sets IP CTS rates in a manner that creates instability or impinges the financial capacity to undertake these investments, it would likely delay the implementation of ASR for IP CTS. Thus, CaptionCall urged the Commission to seek comment on the status of ASR and the appropriate rate for IP CTS at the same time to ensure that the proper incentives are created and maintained.

Please contact me if you have any questions regarding these matters.

Sincerely,

*/s/ Rebekah P. Goodheart*

Rebekah P. Goodheart

cc: Karen Peltz Strauss  
Eliot Greenwald

Marlene H. Dortch

August 25, 2017

Page 3

Robert Aldrich

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